REMARKS

This is intended as a full and complete response to the Final Office Action dated January 16, 2004, having a shortened statutory period for response set to expire on April 16, 2004. Please reconsider the claims pending in the application for reasons discussed below.

Claims 5-11 and 21-29 are pending in the application. Claims 5-11 and 21-29 remain pending following entry of this response. Claims 5, 6, 11 and 21 have been amended. Applicants submit that the amendments do not introduce new matter.

Claims 5-11, 21-29 stand rejected under 35 U.S.C. 103(a) as being unpatentable over US patent #5,848,3 96 (*Gerace*), in view of US patent #6,486,892 (*Stern*). The Examiner suggests that *Gerace* discloses each of the elements of the claims, with the exception of storing a user profile at the client computer, which the Examiner suggests is taught by *Stern*. (Office Action dated January 16, 2004, p. 3.) Applicants respectfully disagree with the Examiner's characterization of *Gerace*, and with the combination of *Gerace* with *Stern*.

First, with respect to *Gerace* alone, Applicants suggest that the Examiner's characterization of *Gerace* is improper. *Gerace* is directed to a computer network method and apparatus providing targeting of appropriate audience based on psychographic or behavioral profiles of end-users. (*See*, Abstract.) The psychographic profile of *Gerace* is generated for, and limited to, a single server hosting a single Home Page. (*See*, Summary of the Invention and Figures 1 and 2.) In contrast, the present claims are directed operations of a client device and are not limited to the manner in which a single web page is displayed, but rather provide display functionality for any network address visited by user. This aspect has been further emphasized by the present amendments. However, Applicants note that the amendments do not present new matter requiring an additional search since the amendments merely serve to emphasize what was already recited in the previous claims. Accordingly, on the basis of *Gerace* alone, Applicants submit that the rejection should be withdrawn and the claims be allowed.

With respect to *Gerace* in combination with *Stern*, Applicants first note that the Examiner characterizes both *Gerace* and *Stern* "in the field of Web information

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retrieving" and suggests that this is the field applicable to the present application. (Office Action dated January 16, 2004, p. 3.) Respectfully, this characterization is improper with respect to the present application, which is more particularly directed to displaying document content. In the context of the present application, the manner in which document content is retrieved is not particularly germane.

Further, Applicants note that *Gerace* teaches a server centric invention, and that the Examiner's suggestion to store the user profile of *Gerace* at the client computer, in view of *Stem*, would render the invention of *Gerace* inoperable or unsatisfactory for its intended purpose, or would change the principle of operation of *Gerace*. Such suggestions to combine are impermissible. MPEP 2143.01. In *Gerace*, all data assembly, tracking, profiling (collectively used to generate a psychographic profile) and web page rendering on the basis of the psychographic profile is done on the server side, not the client side. (*See*, Summary of the Invention and Figure 1). This server centric approach is essential to enabling the invention of *Gerace*. For example, *Gerace* states that when "a user is traveling away from the computers that he normally logs on through (i.e., home and/or office), program 31 enables the user to customize the initial screen view (i.e., Home Page 43)". (Column 10, lines 55-58.) Moving the user profile 37 to the client side, i.e., a particular client device, would prevent the user from being able to log on to the Home Page 43 from any other client device as required by *Gerace*. Accordingly, the Examiner's suggestion would render *Gerace* unsatisfactory for its intended purpose and/or change a principle of operation. Further, *Gerace* teaches that "User Viewing History Objects 37f and other User Objects 37 may be searched by program administrators to find users to target notices to, depending on category of information and presentation details." Moving the user profile 37 to the client side would prevent access to the user profile 37 by administrators as taught by *Gerace*. Accordingly, the Examiner's suggestion would render *Gerace* unsatisfactory for its intended purpose and/or change a principle of operation. Further, *Gerace* teaches that a sponsor is able to obtain performance reports using the User Objects 37a. (Column 18, lines 58-64.) Moving the user profile 37 to the client side would prevent access to the user profile 37 by sponsors as taught by *Gerace*. Accordingly, the Examiner's

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suggestion would render *Gerace* unsatisfactory for its intended purpose and/or change a principle of operation.

The Examiner suggests that the motivation for combining *Gerace* with *Stern* is "easy modification of the profile and for confidential protection". (Office Action dated January 16, 2004, p. 3.) However, both of these purported motivations are inconsistent with *Gerace*. Specifically, allowing individual users to modify their profiles (as suggested by the Examiner) would undermine the credibility of the information contained in the profiles, thereby rendering the profiles meaningless to the sponsors. Similarly, protecting the confidentiality of the profiles by storing them on the respective client devices eliminates accessibility to the profiles by administrators and sponsors. Accordingly, no person skilled in the art would be motivated in the manner suggested by the Examiner.
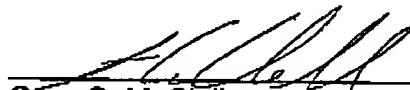
For each of the foregoing reasons, withdrawal of the rejection is respectfully requested.

Applicants submit that the foregoing arguments are sufficient to merit withdrawing all rejections to the present claims. However, Applicants note that nowhere does *Gerace* or *Stern* teach, show or suggest rendering a page in a manner that repositions a portion of the page from an obstructed position (not viewable by a user) to an unobstructed position (viewable by the user). This is because neither *Gerace* nor *Stern* assume a display of limited viewable area. Accordingly, while aspects of *Gerace* may suggest reformatting the Home Page, such reformatting does not guarantee that a particular portion of the Home Page (selected based on previous user interaction with that portion) will be viewable on a display of limited viewing area (such as a personal digital assistant). Relatedly, Applicants note neither *Gerace* nor *Stern* teach, show or suggest determining that "one or more electronic document elements are not positioned in the viewable area of the display for a default display arrangement" as part of a computer-implemented rending process recited in claim 22, for example. The section (11:46-55) cited by the Examiner as a basis for rejecting claim 22 is directed to customization of the Home Page 43 and has nothing to do with determining that document elements are not positioned in a viewable area of a display for a default display arrangement.

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In conclusion, *Gerace* and *Stem*, alone or in combination, do not teach, show, or suggest the invention as claimed.

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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